

FILED**UNITED STATES DISTRICT COURT**

for the

Eastern District of CaliforniaFresno Division

OCT 28 2024

CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIABY 80
DEPUTY CLERKCase No. 1:24CV01313-EPG
(to be filled in by the Clerk's Office)Collins Charo Capital LLC et al.

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-
JOSEPH ROBINETTE BIDEN JR et al.
PHILLIP A TALBERT, BRITTANY M GUNTER,
BARBARA A MCAULIFFE

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Collins Charo Capital LLC et al.</u>
Street Address	<u>1309 Coffeen Avenue Suite 1545</u>
City and County	<u>Sheridan / Sheridan</u>
State and Zip Code	<u>Wyoming, 82801</u>
Telephone Number	<u>307-203-3331</u>
E-mail Address	

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Joseph Robinette Biden Jr.
acting as President of the UNITED STATES OF AMERICA
1600 Pennsylvania Avenue NW,
Washington, DC / District of Columbia
20500
202-456-1111

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Phillip A Talkert
acting as United States Attorney
501 I Street, Suite 10-100
Sacramento / Sacramento County
CA 95814
916-554-2700

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Brittany M Gunter
acting as Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento / Sacramento County
CA 95814
916-554-2700

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Barbara A McAuliffe
acting as U.S. MAGISTRATE JUDGE
2500 Tulare Street, Courtroom 8, 6th Fl
Fresno / Fresno County
CA 93721

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

15 USC 1051, 15 USC 1122(a)(b)(c), 15 USC 1125(a)

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$2,040,000. (DAMAGES) CAUSED BY INFRINGEMENT BY GOVERNMENT.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

Via a phone call it was mentioned to managing director a warrant for an arrest in the name of the company's intellectual property i.e. Trademarks that identifies goods or services and distinguishes the company from competitors.

B. What date and approximate time did the events giving rise to your claim(s) occur?

10-18-24, 4:54pm via phone.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

A message was pass via phone call, stating a warrant for an arrest for the name "MARVIN COLLINS", which is a trademark, along with "MARVIN CHARO COLLINS" from a government agency, person acting for the United States Department of the Treasury.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Collins Charo Capital, LLC could and will suffer losses that would make it difficult to compensate or measure, the company would sustain false designations of origin, false description, and dilution forbidden,

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Collins Charo Capital, LLC ^{seeks} actual losses from actual damages, disgorgement of profits, royalties, statutory damages, and treble damages. The defendant's profits from the infringement can be difficult measure, however profits, Punitive and exemplary includes damis in amount of \$40,000 for Attorney's fees

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

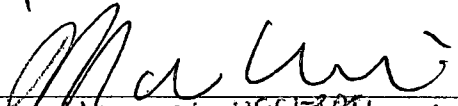
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case. All rights reserved without prejudice.

Date of signing: 10-26-24

Signature of Plaintiff

Printed Name of Plaintiff


Collins Charo Capital, LLC

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address